

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION**

**GREG E. PARKER, JR. AS GUARDIAN  
AD LITEM FOR C.S. AND A.S.,  
MINORS UNDER THE AGE OF  
EIGHTEEN,**

**Plaintiff,**

**V.**

**ZURICH/EMPIRE FIRE AND MARINE  
INSURANCE COMPANY; AND ARCH  
INSURANCE COMPANY,**

## Defendants.

**Case No.:** 3:24-cv-3890-SAL

**RESPONSES TO LOCAL RULE 26.01  
INTERROGATORIES**

Under the provisions of Local Rule 26.01, D.S.C., Defendant responds to the Court's Rule 26.01 Interrogatories as follows:

A. State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

**ANSWER:   None.**

B. As to each claim, state whether it should be tried jury or non-jury and why.

**ANSWER:** At this time, it appears this matter involves legal claims proper for a bench trial. Defendant reserves the right to modify this response to request a jury trial.

C. State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

**ANSWER:**

**Defendant Empire Fire and Marine Insurance Company is a wholly-owned subsidiary of Zurich Insurance Group Ltd., which is a publicly traded company.**

D. State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

**ANSWER: Venue is proper in the District of South Carolina, Columbia Division because a substantial part of the events or omissions giving rise to the claim occurred in Richland County.**

E. Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which *may be* related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical translations, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.<sup>1</sup>

**ANSWER: Upon information and belief, no.**

---

<sup>1</sup> This information is required in addition to completion of the "related cases" block on the JS44 Civil Cover Sheet. Although the Civil Cover Sheet requires only that you disclose *pending* related cases, this interrogatory and this District's assignment procedures require disclosure of *any prior or pending* related case whether civil or criminal. Therefore, both categories should be disclosed in response to this interrogatory as well as on the JS44 Civil Cover Sheet.

F. If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

**ANSWER: Defendant's proper name is Empire Fire and Marine Insurance Company. Counsel will accept service of an amended summons and complaint.**

G. If you contend that some other person of legal entity is, in whole or in part, liable to you or the other party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

**ANSWER: This is under investigation and may be supplemented.**

Respectfully submitted,

**SWEENEY, WINGATE & BARROW, P.A.**

s/Brandon R. Gottschall  
Mark S. Barrow  
Brandon R. Gottschall  
1515 Lady Street  
Post Office Box 12129  
Columbia, South Carolina 29211  
(803) 256-2233

**ATTORNEYS FOR DEFENDANT**

Columbia, South Carolina

July 9, 2024